

EXHIBIT 2

DEFENDANT COUNTRYSIDE/KEITH GHANIAN'S AFFIDAVIT

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KELLY M. BRENEISEN and DANIEL
BRENEISEN, individually, and on behalf
of all others similarly situated,

Plaintiffs,

v.

COUNTRYSIDE CHEVROLET/BUICK/
GMC, INC.

Defendants.

Case No.: 1:20-cv-02867

AFFIDAVIT OF KEITH GHANIAN

I, Keith Ghanian, state that if I were called to testify at an evidentiary hearing, I would
competently testify as follows, based on my personal knowledge:

1. I am the President and Principal for the defendant named in the above captioned
matter, Countryside Chevrolet/Buick/GMC, Inc. ("Countryside").
2. Countryside is a foreign business corporation organized and existing under the
laws of the state of Minnesota, with its principal place of business located in
Beaver Dam, Wisconsin.
3. Countryside does not own, maintain, rent, lease or operate any office, facility, or
other real estate in Illinois.
4. Countryside does not employ any personnel, agents, officers, or directors who
conduct business on its behalf in Illinois.
5. Countryside has no designated agent for service of process in Illinois.
6. Countryside advertises to the general public, but provides no products or services
in the state of Illinois.

7. Though Countryside maintains an interactive website that is accessible to the general public, it does not specifically target Illinois residents.

8. Though Countryside advertises both online and through social media, its social media presence and online advertising is public, accessible nationwide, and does not specifically target Illinois residents.

FURTHER AFFIANT SAYETH NOT.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

AFFIDAVIT OF KEITH GHANIAN

I, Keith Ghanian, state that I was called to testify at an evidentiary hearing. I would testify as follows, based on my personal knowledge:

Keith Ghanian
President/Principal
Countryside Chevrolet/Buick/GMC, Inc.

Subscribed and Sworn to
Before me this 2nd day
of July, 2020

Joan Kaufmann (seal)

